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## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: Timothy P. Jones, : Bankruptcy Case No.: 22-20006-JCM

Leandra Jones,

.

Debtors. : Chapter 13

Timothy P. Jones, Leandra Jones,

: Document No.: 126

Movants, :

: Related to Document No.:

v. :

: Related to Claim No.: 11

LoanCare, LLC,

:

Respondent. :

## **DEBTOR'S DECLARATION OF SUFFICIENT PLAN FUNDING**

Pursuant with the Notice of Mortgage Payment Change filed on August 1, 2023, after reasonable investigation and upon review of the Amended Chapter 13 Plan, it appears to Debtor that the payment is sufficient to fund the Plan even with the proposed change for September 1, 2023.

The new post-petition monthly payment payable to Respondent is \$3,421.47, effective September 1, 2023, per the notice dated August 1, 2023. The Debtor's Amended Plan payment provides for a monthly payment to LoanCare, LLC, of \$3,887.22. Therefore, Debtor's Plan remains sufficient.

Respectfully Submitted,

Date: August 7, 2023 /s/Brian C. Thompson

Brian C. Thompson, Esquire

Attorney for Debtor PA I.D. # 91197

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